

### REMARKS

Claims remaining in the present patent application are numbered 20-24 and 47-57. Claims 55-57 are new. No new matter has been added. The rejections and comments of the Examiner set forth in the Office Action dated December 24, 2003 have been carefully considered by the Applicants. Applicants respectfully request the Examiner to consider and allow the remaining claims.

### 35 U.S.C. §103 Rejection

The present Office Action rejected Claims 20-24 under 35 U.S.C. 103(a) as being unpatentable over Chakvorty et al. (U.S. Patent No. 5,894,188) in view of Kamiya et al. (U.S. Pat. No. 6,320,138). In addition, the present Office Action rejected Claims 47-54 under U.S.C. 103(a) as being unpatentable over Chakvorty et al. in view of Kamiya et al. and further in view of EP 731507 A1 to Takayama. Applicants have reviewed the above-cited references and respectfully submit that the present invention as recited in Claims 20-24 and 47-54 as amended is neither anticipated nor rendered obvious by the Chakvorty et al. reference taken alone or in combination with the Kamiya et al. and/or the Takayama references.

Applicants respectfully point out that Independent Claims 20 and 47, as amended, of the present invention recite, in part:

A multilayer electrode for a flat panel display device, said multilayer electrode comprising:

a metal alloy layer, wherein said metal alloy layer includes neodymium having a concentration of between greater than three atomic percent and six atomic percent; and

a protective layer disposed above said metal alloy layer to form a multilayer stack, said multilayer stack etched to form said multilayer electrode, wherein said protective layer includes an molybdenum tungsten alloy. (Emphasis Added)

The present invention as claimed in Independent Claims 20 and 47, as amended, pertains to a multilayer electrode comprising a metal alloy layer. Applicants respectfully submit that Chakvorty et al. taken alone or in combination with Takayama do not comprise nor suggest a protective layer that includes a molybdenum tungsten alloy (see Specification, page 37, lines 21-27).

Instead, the Chakvorty et al. reference pertains to a cathodic structure in a flat panel display which includes a row metal comprised of aluminum that is not a metal alloy. In addition, the Chakvorty et al. reference refers to the use of refractory metals as a cladding material. However, the Chakvorty et al. reference refers to the use of the refractory metals, molybdenum and tungsten, separately and

independently from each other as a cladding material. That is, the Chakvorty et al. reference refers to either a cladding material comprised of molybdenum, or a cladding material comprised of tungsten.

As such, the Chakvorty et al. reference does not refer to a protective material that includes the combination of molybdenum and tungsten in a molybdenum tungsten alloy, as recited in independent Claims 20 and 47 of the present invention. As a result, Applicants assert that the Chakvorty et al. reference does not comprise or suggest the combination of the molybdenum and tungsten in a molybdenum tungsten alloy, as recited in independent Claims 20 and 47 of the present invention.

Further, the Kamiya et al. reference fails to remedy the problem as the Kamiya et al. reference does not disclose or describe any cladding or protective material. As such, Applicants assert that the Kamiya et al. reference, taken alone or in combination with the Chakvorty et al. reference, does not comprise or suggest the combination of the molybdenum and tungsten in a molybdenum tungsten alloy, as recited in independent Claims 20 and 47 of the present invention.

Moreover, the Takayama reference fails to remedy the problem as the Takayama reference does not disclose or

describe any cladding or protective material. As such, Applicants assert that the Takayama reference, taken alone or in combination with the Chakvorty et al. and Kamiya et al. references, does not comprise or suggest the combination of the molybdenum and tungsten in a molybdenum tungsten alloy, as recited in independent Claims 20 and 47 of the present invention.

Accordingly, Applicants respectfully submit that Independent Claim 20, as amended, overcomes the Examiner's basis for rejection, and as such Claims 21-24 which depend on Independent Claim 20 are also in a condition for allowance as being dependent on an allowable base claim. Further, Applicants respectfully submit that Independent Claim 47, as amended, overcomes the Examiner's basis for rejection, and as such Claims 48-54 which depend on Independent Claim 47 are also in a condition for allowance as being dependent on an allowable base claim.

#### CONCLUSION

In light of the facts and arguments presented herein, Applicants respectfully request reconsideration of the rejected Claims.

Based on the arguments presented above, Applicants respectfully assert that Claims 20-24 and Claims 47-57


overcome the rejections of record. Therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

Wagner, Murabito & Hao LLP

Date: 23 March 2004

A handwritten signature in black ink, appearing to be 'Lin C. Hsu', written over a horizontal line.

Lin C. Hsu  
Reg. No.: 46,395  
Two North Market Street  
Third Floor  
San Jose, California 95113